

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

STATE OF ILLINOIS; JB PRITZKER, in his
official capacity as Governor of the State of Il-
linois; JAMES BENNETT, in his official ca-
pacity as Director of the Illinois Department of
Human Rights; KWAME RAOUL, in his offi-
cial capacity as Attorney General of the State
of Illinois; and ALEXI GIANNOULIAS, in his
official capacity as Secretary of State of the
State of Illinois,

Defendants.

Case No. 1:25-cv-00669

Judge Coleman

NOTICE OF CORRECTED DECLARATIONS

The Alliance respectfully submits the attached corrected declarations for Officers A-B and Edward Blum. When the Alliance’s attorneys were finalizing the original declarations for Blum and Officers A-B in this case, they unintentionally omitted a penalty-of-perjury clause under 28 U.S.C. §1746. *See* Docs.44-1, 44-2, 44-3. The omission was a clerical mistake, not an indication that the testimony was not or could not be sworn as true and correct under penalty of perjury. The Alliance regularly files similar declarations on behalf of its president, Edward Blum, and its anonymous members; and those declarations always include a penalty-of-perjury clause. *E.g., AAER v. Fearless Fund*, Docs.2-9 at 3-4 ¶11, 2-10 at 2-3 ¶15, 2-11 at 2-3 ¶15, 11-1 at 2-3 ¶15, No. 1:23-cv-3424 (N.D. Ga.) (“Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on August 1, 2023.”); *AAER v. Founders First*, Doc.5 at 4

¶20 & 7 ¶11, No. 4:24-cv-327 (N.D. Tex.) (“Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on April 15, 2024.”).

The corrected declarations fix this clerical mistake. The corrected declarations—which are otherwise identical to their original ones—now “declare under penalty of perjury that the foregoing is true and correct.” A-Corr.-Decl.5, B-Corr.-Decl.5, Blum-Corr.-Decl.7. To remove all doubt, the corrected declarations also make clear that, when they “signed [their] original declaration[s],” the declarants “understood that [they were] swearing to the truth of [their declarations’] contents under penalty of perjury.” A-Corr.-Decl. ¶15, B-Corr.-Decl.¶15, Blum-Corr.-Decl. ¶16.

The Alliance’s lawyers take responsibility for the initial clerical error and apologize for any confusion.

Dated: May 7, 2025

Respectfully submitted,

/s/ Cameron T. Norris

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CERTIFICATE OF SERVICE

On May 7, 2025, this document and its attachments were e-filed with the Court, automatically emailing everyone requiring service.

/s/ Cameron T. Norris